

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

MYNOR ABDIEL TUN-COS, )  
JOSÉ PAJARITO SAPUT, )  
LUIS VELASQUEZ PERDOMO, )  
PEDRO VELASQUEZ PERDOMO, )  
GERMÁN VELASQUEZ PERDOMO, )  
EDER AGUILAR ARITAS, )  
EDUARDO MONTAÑO FERNÁNDEZ, )  
NELSON CALLEJAS PEÑA, )  
and )  
JOSÉ CÁRCAMO )  
Plaintiffs, ) Case No.: 1:17-cv-00943 (AJT-TCB)  
v. )  
B. PERROTTE, T. OSBORNE, D. HUN YIM, )  
P. MANNEH, and A. NICHOLS, )  
ICE AGENTS )  
Defendants. )

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE  
LIMITATIONS**

Plaintiffs Mynor Abdiel Tun-Cos, José Pajarito Saput, Luis Velasquez Perdomo, Pedro Velasquez Perdomo, Germán Velasquez Perdomo, Edeer Aguilar Aritas, Eduwardo Montaño Fernández, Nelson Callejas Peña, and José Cárcamo, through their undersigned counsel, respectfully seek leave to file a thirty-seven (37) page response memorandum in opposition to Defendants' Motion to Dismiss.

Local Rule 7(F)(3) provides that, "for good cause shown in advance of filing," response memoranda may exceed thirty pages. On January 2, 2018, Defendants filed an unopposed motion seeking leave to file a thirty-seven page memorandum in support of their motion to dismiss, Dkt. 37, which this Court granted, Dkt. 41. On the same day, Defendants filed their

motion to dismiss and accompanying thirty-seven page brief. Dkts. 38, 39. Plaintiffs' request seven additional pages to address the arguments raised in Defendants' brief. Undersigned counsel conferred with Defendants' counsel, and Defendants' counsel does not oppose this request.

Dated: January 12, 2018

Respectfully submitted,

**LEGAL AID JUSTICE CENTER**

By: \_\_\_\_\_//s// \_\_\_\_\_  
Simon Y. Sandoval-Moshenberg (VSB No. 77110)  
Nicholas Marritz (VSB No. 89795)  
Hallie Ryan (VSB No. 85927)  
6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
(703) 720-5605  
simon@justice4all.org  
nicholas@justice4all.org

**COVINGTON & BURLING LLP**

By: \_\_\_\_\_//s// \_\_\_\_\_  
Daniel E. Johnson (VSB No. 88696)  
Mark H. Lynch (*pro hac vice*)  
José E. Arvelo (*pro hac vice*)  
Brandon H. Johnson (*pro hac vice*)  
Daniel T. Grant (*pro hac vice*)  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
(202) 662-5224  
dejohnson@cov.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 12, 2018, the foregoing document was served on Defendants via the CM/ECF System to: Dennis C. Barghaan, Jr., Deputy Chief, Civil Division, Assistant U.S. Attorney, 2100 Jamieson Avenue, Alexandria, VA 22314; e-mail: dennis.barghaan@usdoj.gov.

**LEGAL AID JUSTICE CENTER**

By: \_\_\_\_\_ //s//  
Hallie Ryan (VSB No. 85927)

6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
(703) 226-3426  
hallie@justice4all.org